

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY for the
DRAFT CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Bridgestone Firestone North American Tire, LLC
1600 Fort Jesse Road, Normal, Illinois 61761

Illinois EPA ID Number: 113823AAB

Application Number: 95120125

Application Type: Renewal

Start of Public Comment Period: June 22, 2006

Close of Public Comment Period: July 22, 2006

Permit Engineer/Technical Contact: Anatoly Belogorsky, 217/782-2113

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(This Project Summary generally describes the source and explains the draft permit. This document has been prepared pursuant to Section 39.5(8)(b) of the Illinois Environmental Protection Act, which requires "a statement that sets forth the legal and factual basis for the draft CAAPP permit conditions.")

I. INTRODUCTION

This source has applied for a renewal of the Clean Air Act Permit Program (CAAPP) operating permit. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by Title V of the federal Clean Air Act and Section 39.5 of Illinois' Environmental Protection Act. The conditions in a CAAPP permit are enforceable by the Illinois Environmental Protection Agency (Illinois EPA), the USEPA, and the public. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A CAAPP permit contains conditions identifying the applicable state and federal air pollution control requirements that apply to a source. The permit also establishes emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit. Further explanations of the specific provisions of the draft CAAPP permit are contained in the attachments to this document, which also identify the various emission units at the source.

II. GENERAL SOURCE DESCRIPTION

a. Nature of source

Bridgestone Firestone North American Tire, LLC is located at Veterans Parkway and Fort Jesse Road in Normal and manufactures off-road rubber tires. The source operates the following significant emission units at this site: rubber mills, calender stations, green tire assembly and spray booth stations, curing presses, solvent storage tank, and fuel combustion emission units.

b. Ambient air quality status for the area

The source is located in an area that is currently designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants (carbon monoxide, lead, nitrogen dioxide, ozone, PM_{2.5}, PM₁₀, sulfur dioxide).

c. Major source status

The source requires a CAAPP permit as a major source of VOM emissions.

d. Source Emissions

The following table lists actual annual emissions of criteria pollutants from this source, as reported in the Annual Emission

Reports sent to the Illinois EPA.

	Annual Emissions (tons)				
Pollutant	2000	2001	2002	2003	2004
CO	6.58	5.46	5.23	4.97	4.82
NOx	26.49	23.14	20.82	20.16	20.02
PM	2.6	2.18	2.28	2.07	1.83
SO2	0.13	0.82	0.092	0.074	0.064
VOM	246.6	191.87	234.65	226.48	223.48

III. NEW SOURCE REVIEW / TITLE I CONDITIONS

This draft permit contains terms and conditions that address the applicability of permit programs for new and modified sources under Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the draft permit by T1, T1R, or T1N. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this draft permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new conditions or revise such conditions in a Title I permit, those conditions are consistent with the information provided in the CAAPP application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This draft permit would not establish any new Title I requirements or revised Title I requirements.

IV. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source. In addition, the draft permit requires the source to certify its compliance status on an annual basis.

V. PROPOSED ILLINOIS EPA ACTION / REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA for the draft or proposed permit, pursuant to 35 IAC Part 252 and Sections 39.5(8) and (9) of the Illinois Environmental Protection Act. A final decision on the draft or proposed permit will not be made until the public, affected states, and USEPA have had an opportunity to comment. The Illinois EPA is not required to accept recommendations that are not based on applicable requirements. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.

ATTACHMENT 1: Summary of Source-Wide Requirements

- a. The following table indicates the source-wide emissions control programs and planning requirements that are applicable to this source. These programs are addressed in Sections 5 and 6 of the draft permit.

Program/Plan	Applicable
Emissions Reduction Market System (ERMS)	N/A
Nitrogen Oxides (NO _x) Trading Program	N/A
Acid Rain Program	N/A
Fugitive Particulate Matter (PM) Operating Program	N/A
Risk Management Plan (RMP)	N/A
PM ₁₀ Contingency Measure Plan	N/A

- b. The following table indicates source-wide site-specific requirements addressed in Section 5 of the draft permit.

Non-Applicable Rules and Requirements w/justification
<ul style="list-style-type: none"> • This source is not subject to 35 IAC Part 215 Subpart S "Rubber and Miscellaneous Plastic Products". <u>This regulation applies for tires with a bead diameter of less than 20.0 inches, as defined in 35 IAC 211.4790. This non-applicability is based on the size of tires (from about 36 inches and more in diameter) manufactured at this location.</u> • 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry": <u>This non-applicability is based on the size of the tires (from about 36 inches and more in diameter) manufactured at this location. Applicability criteria of this rule is less than 19.7 inches in diameter</u> • This source is not subject to 40 CFR Part 63, Subpart XXXX "Rubber Tire Manufacturing": <u>This non-applicability is based on the minor (non-major) HAP status of this source and the HAP emissions limitation placed in the Condition 5.6.2 of the draft permit. These limitations had been established earlier in the initial CAAPP permit and prior to compliance date (2005) of Subpart XXXX. Therefore, "once in - always in" provision is not applied.</u>
Title I Conditions and/or Synthetic Minor Limits
<ul style="list-style-type: none"> • Potential HAP emissions are limited to less than 10 tons/yr of individual HAP and 25 tons/yr total. These limits are established in the Condition 5.6.2 of the draft permit
Testing, Monitoring and Recordkeeping
<ul style="list-style-type: none"> • <u>Testing:</u> HAP content in coatings and other HAP-contained materials should be tested if the Annual Emission Report for the previous year indicated that 10/25 tons/yr HAP limits were approached by more than 80% • <u>Monitoring:</u> testing, recordkeeping and reporting serve the purposes of monitoring of HAP emissions and HAP content • <u>Recordkeeping:</u> records for HAP emissions shall be kept for verifying non-major status and exemption from 40 CFR Part 63 Subpart XXXX

ATTACHMENT 2: Summary of Requirements for Specific Emission Units

The following tables include information on the requirements that apply to significant emission units at this source. The requirements are found in Section 7 of the draft permit, which is further divided into subsection, i.e., Section 7.1, 7.2, etc., for the different categories of units at the source. A separate table is provided for each subsection in Section 7 of the draft permit. An explanation of acronyms and abbreviations is contained in Section 2 of the draft permit.

Table 1 (Section 7.1 of the draft permit)

Emission Unit	
Name	Rubber Mills (9 units)
Description	The purchased rubber is first milled, which is the process of working and blending the various rubber compounds between sets of metal rollers. Milling not only blends the rubber compounds but raises its temperature. Raising the temperature of the rubber makes it more pliable and able to withstand the mechanical stresses imposed by the manufacturing operations carried out at the facility. There are nine primary mills at this location. The rubber is passed from mill to mill to process and prepare the various compounds. Once the rubber is properly blended and prepared, overhead conveyors transfer it from the mills to the various manufacturing operations.
Date Constructed	1965-1967
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none">• 35 IAC 212.322(b)(1): PM emissions are limited to the certain limits based on the process weight rates of processed materials and the formulas• 35 IAC 215.301: VOM emissions are limited to 8 lb/hr from each individual emission limit
Streamlining	N/A
Title I Conditions	N/A
Non-applicability	<ul style="list-style-type: none">• Compliance Assurance Monitoring CAM), 40 CFR Part 64: add-on control device is not used to achieve compliance with an emission limitation or standard
Periodic Monitoring (other than basic regulatory requirements)	
Testing	N/A
Emissions Monitoring	<ul style="list-style-type: none">• No direct emission monitoring is required. However, appropriate recordkeeping and emission factor serve this need
Operational Monitoring	<ul style="list-style-type: none">• No direct operational monitoring is required. However, appropriate recordkeeping and emission factor serve this need

Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> Rubber throughput and VOM emissions
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> Excess of VOM emissions within 30 days of occurrence
Other Reporting	N/A
Other Information	
Footnotes	N/A

Table 2 (Section 7.2 of the draft permit)

Emission Unit	
Name	Calender Stations (3 units)
Description	Calendering is the blending and shaping of rubber by pressing it between rotating metal cylinders. The calendars form the rubber into thin sheets of material. Fabrics or steel can be inserted between layers of calendered rubber to add strength to the product.
Date Constructed	1965-1967
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.322(b) (1): PM emissions are limited to the certain limits based on the process weight rates of processed materials and the formulas • 35 IAC 215.301: VOM emissions are limited to 8 lb/hr from each individual emission limit • 35 IAC 212.123(a): 30% opacity
Streamlining	N/A
Title I Conditions	N/A
Non-applicability	<ul style="list-style-type: none"> • Compliance Assurance Monitoring CAM), 40 CFR Part 64: add-on control device is not used to achieve compliance with an emission limitation or standard
Periodic Monitoring (other than basic regulatory requirements)	
Testing	N/A
Emissions Monitoring	<ul style="list-style-type: none"> • No direct emission monitoring is required. However, appropriate recordkeeping and emission factor serve this need
Operational Monitoring	<ul style="list-style-type: none"> • No direct operational monitoring is required. However, appropriate recordkeeping and emission factor serve this need
Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> • Rubber throughput and VOM emissions • VOM emissions
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • Excess of VOM emissions within 30 days of occurrence
Other Reporting	N/A
Other Information	
Footnotes	N/A

Table 3 (Section 7.3 of the draft permit)

Emission Unit	
Name	Green Tire Assembly Stations (30 units)
Description	<p>All green tire assembly stations are grouped into the following categories: band-building, carcass building, and treading.</p> <p>The inner liner is first wrapped around a metal cylinder the size of which is dependent upon the required bead diameter. After this, calendared belt material is wrapped around the inner bladder. The number of belts varies depending upon the required strength of the finished product. The beads are then inserted and the sidewalls are added. The final step is the addition of the tread material. Solvents are applied to the tire assemblies as needed to help the various rubber components adhere to one another.</p>
Date Constructed	1965-1998
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.322(b) (1): PM emissions are limited to the certain limits based on the process weight rates of processed materials and the formulas • 35 IAC 212.321(b) (1): PM emissions are limited to the certain limits based on the process weight rates of processed materials and the formulas • 35 IAC 215.301: VOM emissions are limited to 8 lb/hr from each individual emission limit • 35 IAC 212.123(a): 30% opacity
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on emissions for number of green tire assembly stations in Condition 7.3.6. These limits were incorporated from Permits 94100027, 95020123, 96060051, 97010083, 99010021, 99100091.
Non-applicability	<ul style="list-style-type: none"> • Compliance Assurance Monitoring CAM), 40 CFR Part 64: add-on control device is not used to achieve compliance with an emission limitation or standard • 35 IAC Part 215 Subpart S "Rubber and Miscellaneous Plastic Products" and 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry". These exemptions are based on the size of tires (from about 36 inches and more in diameter) manufactured at this location. At the same time, applicability criteria was established at 19.7 inches and less in a tire diameter.
Periodic Monitoring (other than basic regulatory requirements)	

Testing	<ul style="list-style-type: none"> Annual certification on the VOM content (lb/gal or wt.%) for each solvent applied
Emissions Monitoring	<ul style="list-style-type: none"> No direct emission monitoring is required. However, appropriate recordkeeping and formula for emission calculation serve this need
Operational Monitoring	<ul style="list-style-type: none"> Testing and recordkeeping procedures of Section 7.3 serve the needs of non-instrumental monitoring for the affected assembly stations
Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> Material throughput; solvent usage; VOM content in the solvents; monthly and annual VOM emissions
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> Excess of VOM emissions within 30 days of such occurrence.
Other Reporting	N/A
Other Information	
Footnotes	N/A

Table 4 (Section 7.4 of the draft permit)

Emission Unit	
Name	Green Tire Doping & Finishing Spray Booths (2 doping spray booths and one finish spray booth)
Description	<p>Green tires from the assembly stations are transferred to the green tire storage area or to the green tire doping operations. In the doping operations the insides of the green tires are sprayed with a lubricating solution. This lubricating solution is a water based compound that keeps the tires from sticking to the bladders used to inflate them for curing. The outsides of the green tires are sprayed with a water based blemish paint that covers blemishes and areas of discoloration on the surfaces of the tires.</p> <p>In the finishing department the repaired tires that pass the visual inspection process have the repaired areas ground and buffed to smooth the repair and make it blend in with the rest of the tire. These tires are then sprayed with a blemish paint and sent to the warehouse. This coating process covers any remaining areas of discoloration and provides uniform coloring to the facility's products. The solvents used in this booth consist of waste solvent collected from the individual manufacturing stations.</p>
Date Constructed	1968 (finish spray booth)
Emission Control Equipment	Filters
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.322(b)(1): PM emissions are limited to the certain limits based on the process weight rates of processed materials and the formulas • 35 IAC 212.321(b)(1): PM emissions are limited to the certain limits based on the process weight rates of processed materials and the formulas • 35 IAC 215.301: VOM emissions are limited to 8 lb/hr from each individual emission limit • 35 IAC 212.123(a): 30% opacity
Streamlining	N/A
Title I Conditions	N/A
Non-applicability	<ul style="list-style-type: none"> • Compliance Assurance Monitoring CAM), 40 CFR Part 64: 1) add-on control device is not used to achieve compliance with VOM emission limitation or standard (filters control PM emissions only); and 2) potential pre-control emissions are less than major source threshold (<100 t/yr).
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Annual certification on the VOM content (lb/gal or wt.%) for each solvent applied on the affected assembly stations

Emissions Monitoring	<ul style="list-style-type: none"> No direct emission monitoring is required. However, appropriate recordkeeping and formula for emission calculation serve this need
Operational Monitoring	<ul style="list-style-type: none"> No direct emission monitoring is required. However, appropriate recordkeeping and formula for emission calculation serve this need
Inspections	<ul style="list-style-type: none"> Monthly periodic inspection, routine maintenance and prompt repairs of defects
Recordkeeping	<ul style="list-style-type: none"> Material throughput; solvent usage; VOM content in the solvents; monthly and annual VOM emissions; log of inspections and maintenance/repair
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> Excess of VOM emission limits within 30 days of such occurrence
Other Information	
Footnotes	N/A

Table 5 (Section 7.5 of the draft permit)

Emission Unit	
Name	Curing Presses (39 units)
Description	The source currently uses two basic types of curing machines to cure the tires manufactured by this plant. The first type of machines used at the source is referred to as a "press" and is used to cure the facility's smaller tires. These presses are each capable of curing one tire at a time. The second and largest type of curing machines at the source is capable of curing the facility's present full range of tire sizes. These tires can range from less than three feet to greater than 12 feet in diameter. These machines are referred to as "pot heaters" and are each capable of curing several tires at once. For purposes of the CAAPP permit, "curing press" is referenced to all types of curing machines. On all curing presses the tires are cured with a combination of hot water and steam.
Date Constructed	1965-1975
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.322(b) (1): PM emissions are limited to the certain limits based on the process weight rates of processed materials and the formulas • 35 IAC 212.321(b) (1): PM emissions are limited to the certain limits based on the process weight rates of processed materials and the formulas • 35 IAC 215.301: VOM emissions are limited to 8 lb/hr from each individual emission limit • 35 IAC 212.123(a): 30% opacity
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on emissions in Condition 7.5.6. These limits were incorporated from Permits 96060051, 98100016, 98010008, 99060090.
Non-applicability	<ul style="list-style-type: none"> • Compliance Assurance Monitoring CAM), 40 CFR Part 64: add-on control device is not used to achieve compliance with an emission limitation or standard
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • N/A
Emissions Monitoring	<ul style="list-style-type: none"> • No direct emission monitoring is required. However, appropriate recordkeeping and emission factor serve this need
Operational Monitoring	<ul style="list-style-type: none"> • No direct operational monitoring is required. However, appropriate recordkeeping and emission factor serve this need
Inspections	N/A

Recordkeeping	<ul style="list-style-type: none"> Rubber throughput and VOM emissions
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> Excess of VOM emission limits within 30 days of such occurrence
Other Information	
Footnotes	N/A

Table 6 (Section 7.6 of the draft permit)

Emission Unit	
Name	Solvent Storage Tank
Description	Solvents are stored at the 10,000 gallons storage tank equipped with a submerged loading pipe.
Date Constructed	1988
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> 35 IAC 215.122(b): Tank should be equipped with a submerged loading pipe during loading operations
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> The draft permit contains limits on operation and emissions in Condition 7.6.6. These limits were incorporated from Permit 96060051.
Non-applicability	<ul style="list-style-type: none"> Compliance Assurance Monitoring CAM), 40 CFR Part 64: add-on control device is not used to achieve compliance with an emission limitation or standard 35 IAC 215.121: the tank is less than 40,000 gal. 40 CFR 60 Subpart Kb: the tank is less than 40 cubic meters (10,576 meters)
Periodic Monitoring (other than basic regulatory requirements)	
Testing	N/A
Emissions Monitoring	<ul style="list-style-type: none"> No direct emission monitoring is required. However, appropriate recordkeeping and procedure on how to calculate emissions serve this need
Operational Monitoring	<ul style="list-style-type: none"> No direct operational monitoring is required. However, appropriate recordkeeping, inspection and procedure on how to calculate emissions serve this need
Inspections	<ul style="list-style-type: none"> Annual inspections of conditions of the tank and the proper operation of a submerged loading pipe
Recordkeeping	<ul style="list-style-type: none"> Solvent throughput and VOM emissions Maintenance/repair log of inspections and the dates of the corrective actions taken.
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> Excess of VOM emission limits within 30 days of such occurrence
Other Information	
Footnotes	N/A

Table 7 (Section 7.7 of the draft permit)

Emission Unit	
Name	Fuel Combustion Emission Units
Description	Natural gas and waste oil fired boilers are used to produce heat and steam at the source. Natural gas-fired heaters are used for comfort heating purposes.
Date Constructed	1965 (Heaters)
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 216.121: CO concentration should be less than 200 ppm • 35 IAC 212.206: PM emissions should be less than 0.10 lb/mmBtu (for firing waste oil only) • 35 IAC 214.161: SO₂ emissions should be less than 1.0 lb/mmBtu (residual fuel oil) and less than 0.3 lb/mmBtu (distillate fuel oil) (for firing waste oil only) • 35 IAC 212.123(a): 30% opacity
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Condition 7.7.6. These limits were incorporated from Permit 73010510.
Non-applicability	<ul style="list-style-type: none"> • Compliance Assurance Monitoring (CAM), 40 CFR Part 64: add-on control device is not used to achieve compliance with an emission limitation or standard • 35 IAC Part 215, Subpart G Use of Organic Material: fuel combustion emission units are exempt pursuant to 215.303 • 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources in Major Metropolitan Areas: heat input is less than 250 mmBtu/hr
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Representative samples of waste oil should be analyzed • Method 9 for annual testing of opacity (when waste oil is fired) • Method 5 for PM emissions testing one time in five years (when waste oil is fired)
Emissions Monitoring	<ul style="list-style-type: none"> • No direct emission monitoring is required. However, appropriate recordkeeping, testing and emission factors serve this need

Operational Monitoring	<ul style="list-style-type: none"> No direct operational monitoring is required. However, appropriate recordkeeping, testing and emission factors serve this need
Inspections	<ul style="list-style-type: none"> Annual CO combustion analyses (if waste oil is fired)
Recordkeeping	<ul style="list-style-type: none"> Natural gas and fuel oil consumption; test data; emissions Test results CO combustion analysis results Emissions released
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> Excess of emission and production limits within 30 days of such occurrence
Other Information	
Footnotes	N/A

ATTACHMENT 3: Prompt Reporting of Deviations

Prompt reporting of deviations is critical in order to have timely notice of deviations and the opportunity to respond, if necessary. The effectiveness of the permit depends upon, among other important elements, timely and accurate reporting. The Illinois EPA, USEPA and the public rely on timely and accurate reports submitted by the permittee to measure compliance and to direct investigation and follow-up activities. Prompt reporting is evidence of a permittee's good faith in disclosing deviations and describing the steps taken to return to compliance and prevent similar incidents.

Any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in this CAAPP permit is a deviation subject to prompt reporting. Additionally, any failure to comply with any permit term or condition is a deviation of that permit term or condition and must be reported to the Illinois EPA as a permit deviation. The deviation may or may not be a violation of an emission limitation or standard. A permit deviation can exist even though other indicators of compliance suggest that no emissions violation or exceedance has occurred. Reporting permit deviations does not necessarily result in enforcement action. The Illinois EPA has the discretion to take enforcement action for permit deviations that may or may not constitute an emission limitation or standard or the like, as necessary and appropriate.

Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(B), requires prompt reporting of deviations from the permit requirements. The permitting authority (in this case, Illinois EPA) has the discretion to define "prompt" in relation to the degree and type of deviation likely to occur. Furthermore, Section 39.5(7)(f)(i) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(A) requires that monitoring reports must be submitted at least every 6 months. Therefore, USEPA generally considers anything less than 6 months to be "prompt" as long as the selected time frame is justified appropriately (60 Fed. Reg. 36083, 36086 (July 13, 1995)).

The USEPA has stated that, for purposes of administrative efficiency and clarity, it is acceptable to define prompt in each individual permit. *Id.* The Illinois EPA has elected to follow this approach and defines prompt reporting on a permit by permit basis. In instances where the underlying applicable requirement contains "prompt" reporting, this frequency or a shorter frequency of reporting is the required timeframe used in this permit. Where the underlying applicable requirement fails to explicitly set forth the timeframe for reporting deviations, the Illinois EPA has developed a structured manner to determine the reporting approach used in this permit.

The Illinois EPA generally uses a time frame of 30 days to define prompt reporting of most deviations. Also, for certain permit conditions in individual permits, the Illinois EPA may require an alternate timeframe that is less than 30 days if the permit requirement justifies a shorter reporting time period. Under certain circumstances, EPA may establish a deviation reporting period longer than 30 days, but, in no event exceeding 6 months. Where it has established a deviation reporting period other than 30 days in an individual permit (specifically Section 7.x.10), the Illinois EPA has explained the reason for the alternative timeframe. (See Attachment 2 of this Project Summary.)

The timing for certain deviation reporting may be different when a source or emission unit at a source warrants reporting to address operation, independent of the occurrence of any deviations. This is the case for a source that is required to perform continuous monitoring for the emission unit, for which quarterly or semi-annual "monitoring" reports are appropriate. Where appropriate, reporting of deviations has generally been combined in, or coordinated with these quarterly or semi-annual reports, so that the overall performance of the plant can be reviewed in a comprehensive fashion. This will allow a more effective and efficient review

of the overall performance of the source by the Illinois EPA and other interested parties, as well as by the source itself.

At the same time, there are certain deviations for which quicker reporting is appropriate. These are deviations for which individual attention or concern may be warranted by the Illinois EPA, USEPA, and other interested parties. Under this scenario, emphasis has been placed primarily on deviations that could represent substantial violations of applicable emission standards or lapses in control measures at the source. For these purposes, depending on the deviation, immediate notification may be required and preceded by a follow-up report submitted within 15 days, during which time the source may further assess the deviation and prepare its detailed plan of corrective action.

In determining the timeframe for prompt reporting, the Illinois EPA assesses a variety of criteria such as:

- historical ability to remain in continued compliance,
- level of public interest in a specific pollutant and/or source,
- seriousness of the deviation and potential to cause harm,
- importance of applicable requirement to achieving environmental goals,
- designation of the area (i.e., non-attainment or attainment),
- consistency among industry type and category,
- frequency of required continuous monitoring reports (i.e., quarterly),
- type of monitoring (inspection, emissions, operational, etc.), and
- air pollution control device type and operation

These prompt reporting decisions reflect the Illinois EPA's consideration of the possible nature of deviations by different emission units and the responses that might be required or taken for those different types of deviations. As a consequence, the conditions for different emission units may identify types of deviations which include but are not limited to: 1) Immediate (or very quick) notification; 2) Notification within 30 days as the standard; or 3) Notification with regular quarterly or semi-annual monitoring reports.

The Illinois EPA's decision to use the above stated prompt reporting approach for deviations as it pertains to establishing a shorter timeframe in certain circumstances reflects the criteria discussed as well as USEPA guidance on the topic.

- 40 CFR 71.6(a)(3)(iii)(B) specifies that certain potentially serious deviations must be reported within 24 or 48 hours, but provides for semi-annual reporting of other deviations. (Serious or severe consequences)
- FR Vol. 60, No. 134, July 13, 1995, pg. 36086 states that prompt should generally be defined as requiring reporting within two to ten days of the deviation, but longer time periods may be acceptable for a source with a low level of excess emissions. (intermediate consequences)
- Policy Statement typically referred to as the "Audit Policy" published by the USEPA defines prompt disclosure to be within 21 days of discovery. (Standard for most "pollutant limiting" related conditions)
- Responses to various States by USEPA regarding other States' definition of prompt.

As a result, the Illinois EPA's approach to prompt reporting for deviations as discussed herein is consistent with the requirements of 39.5(7)(f)(ii) of the Act as well as 40 CFR part 70 and the CAA. This reporting arrangement is designed so that the source will appropriately notify the Illinois EPA of those events that might warrant individual attention. The timing for these event-specific notifications is necessary and appropriate as it gives the source enough time to conduct a thorough investigation into the causes of an event, collecting any necessary data, and to develop preventative measures, to reduce the likelihood of similar events, all of which must be addressed in the notification for the deviation.

